

UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
REGION 10, NASHVILLE RESIDENT OFFICE

JOHNSTON FIRE SERVICES LLC

And

Case No. 10-CA-175681

Case No. 10-CA-177542

ROAD SPRINKLERS FITTERS LOCAL UNION 669

JOHNSTON FIRE SERVICES LLC' MOTION TO RESCHEDULE HEARING

Comes the Respondent, Johnston Fire Services LLC ("Respondent"), by and through the undersigned attorney, for its Motion to Reschedule Hearing, states as follows:

1. This matter is set for a hearing on October 17, 2016. The undersigned is currently representing a physician in a medical staff revocation proceeding in which a hearing under the hospital's medical staff bylaws is set for October 19-20, 2016. This matter has been pending for some amount of time and has consumed a large part of the undersigned's practice and will continue to consume a large part of his practice until the hearing.

2. The undersigned will not have the ability to prepare for the hearing set in this matter coextensively with the conflicting hearing scheduled to begin a mere two days later.

3. The undersigned has numerous alternate dates for the month of November, including the week of November 7; November 26-18; November 21-23; and the week of December 5.

4. A teleconference is currently scheduled for this afternoon, September 23, 2016 in which this matter may be discussed with all counsel and the ALJ.

WHEREFORE, for the foregoing reasons, Respondent respectfully requests that the hearing be postponed and rescheduled for a new time and date.

Respectfully submitted,

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Attorneys for Respondent Johnston Fire Services LLC

CERTIFICATE OF SERVICE

I hereby certify that the foregoing was electronically filed on September 23, 2016 and sent by US Mail, First Class, and Postage Prepaid, to the following parties or representatives:

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DATED this 23rd day of September, 2016

/s/David L Kelly
David L Kelly